

EXHIBIT 67

Highly Confidential - Subject to Further Confidentiality Review

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 Case No.
8 1:17-MD-2804
9
10 THIS DOCUMENT RELATES) Hon. Dan A.
11 TO ALL CASES) Polster
12

13 WEDNESDAY, AUGUST 1, 2018

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Nathan J.
18 Hartle, held at the offices of Covington &
19 Burlington, LLP, One City Center, 850 Tenth
20 Street Northwest, Washington, DC, commencing
21 at 9:03 a.m., on the above date, before
22 Carrie A. Campbell, Registered Diplomate
23 Reporter, Certified Realtime Reporter,
24 Illinois, California & Texas Certified
25 Shorthand Reporter, Missouri & Kansas
Certified Court Reporter.

- - -

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1. The first part of the paper is a review of the literature on the topic.

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Journal of Internal Medicine 247: 101–107

1. The first step is to identify the problem.



2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 2681, 26

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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11 QUESTIONS BY MR. RAFFERTY:

12 Q. Okay. Thank you.

13 All right. I want to talk for
14 a few minutes about the opioid epidemic in
15 the United States.

16 First of all, you agree that
17 there is, in fact, an opioid epidemic in the
18 United States, true?

19 A. I do agree.

20 Q. And that epidemic has been
21 going on for years, correct?

22 A. Based on what I read and what I
23 know, absolutely.

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Q. Okay.

14

A. It's why I do what I do.

15

Q. All right. In fact, you would

16

agree that this epidemic has had a

17

devastating effect on public health and

18

welfare throughout the country, true?

19

A. It has.

20

Q. And in fact, you have spoken

21

and actually given presentations about the

22

opioid epidemic in the country, correct?

23

A. I have.

24

Q. In fact, would you agree that

25

the opioid epidemic in the United States of

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1 America is the deadliest drug epidemic on
2 record in our country's history?

3 A. I'm not an epidemiologist, but
4 I would believe, yes.

5 Q. Okay. Well, let's look at
6 1437.3, which we will mark as Exhibit 41 --
7 42.

8 (McKesson-Hartle Exhibit 42
9 marked for identification.)

10 QUESTIONS BY MR. RAFFERTY:

11 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

16 Q. Okay. And it appears, though
17 this one does have a date on it, it's
18 September 29, 2017. So not really all that
19 long ago, right?

20 A. Correct.

21 Q. Okay. Less than a year ago,
22 right?

23 A. That is.

24 Q. And you see down there Nate
25 Hartle, senior director, regulatory affairs,

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1 right?

2 A. Yeah, it's my document.

3 Q. Okay. Do you recall giving
4 this presentation?

5 A. I do.

6 MR. RAFFERTY: If we could,
7 let's turn to .3, Corey.

8 QUESTIONS BY MR. RAFFERTY:

9 Q. You see that up in the top of
10 one of your slides there on page 3, a
11 headline, "Deadliest Drug Epidemic on Record
12 in Our Nation's History"?

13 Do you see that?

14 A. Yep.

15 Q. You wouldn't have put that in
16 your presentation unless you thought it was
17 true, right?

18 A. No.

19 Q. So you don't dispute that,
20 right?

21 A. I do not.

22 Q. Okay. It then goes on and
23 says, "The drug problems of past decades pale
24 when compared to the current opioid epidemic
25 which has killed 165,000 Americans from 2000

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1 to 2014."

2 Did I read that right?

3 A. You did.

4 Q. Okay. Once again, you agree
5 with that statement, right?

6 A. These are part of the
7 presentation that I gave.

8 Q. Okay. If we now go to the next
9 page, page 4, it says over there, "Scope of
10 the problem." On an average day, an average
11 day in the US, more than 650,000 opioid
12 prescriptions are dispensed.

13 Do you see that?

14 A. I do.

15 Q. 3,900 people initiate
16 non-medical use of prescription opioids, and
17 then it says 580 people initiate heroin use.

18 You see that?

19 A. I see those.

20 Q. And in fact, opioid abuse and
21 addiction is a gateway to heroin use and
22 addiction, correct?

23 MS. HENN: Objection to form.

24 THE WITNESS: I'm not a medical
25 expert, but, you know, I've read

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1 things, I use data from different
2 sources, and they say that.

3 QUESTIONS BY MR. RAFFERTY:

4 Q. I don't -- okay. As head of
5 regulatory affairs and the controlled
6 substance monitoring program for national
7 chains of McKesson, would you agree that in
8 fact narcotic painkiller abuse, opioid abuse,
9 is a gateway to heroin use?

10 MS. HENN: Objection to form.

11 THE WITNESS: I would agree
12 that it can be, yeah.

13 QUESTIONS BY MR. RAFFERTY:

14 Q. Okay. And in fact, 78 people
15 die from an opioid-related overdose every day
16 according to your slide.

17 Do you see that?

18 A. I see that.

19 Q. In fact, if you go on to your
20 presentation, page 16, .16, talking about the
21 heroin use, it says -- or what you say in
22 your presentation, or what you put in your
23 presentation, was people who are addicted
24 to -- and then it says, "Opioid painkillers
25 are 40 times more likely to be addicted to

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1 heroin."

2 Do you see that?

3 A. I see that.

4 Q. And you agree with that?

5 A. I put them in the slides as
6 part of the information that I keep current
7 on.

8 Q. You agree with that?

9 A. Again, I'm not an expert in
10 terms of numbers, but I agree with what
11 they're putting out.

12 Q. Okay.

13 A. The concepts --

14 Q. And you wouldn't have put it
15 out there if you thought it was inaccurate,
16 right?

17 A. I would not have.

18 Q. Okay. Talking about the
19 heroin, the gateway to heroin, if we could,
20 let's have 1580.

21 (McKesson-Hartle Exhibit 43
22 marked for identification.)

23 QUESTIONS BY MR. RAFFERTY:

24 Q. This is another presentation
25 that you gave, Mr. Hartle. We'll mark this

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1 as Exhibit 43. This is another presentation
2 that you gave. If you look at this --

3 MR. RAFFERTY: Corey, if you
4 could pull it up, please, 1.580 --
5 1.1580.

6 All right. Just give me the
7 Elmo. I'll just use the Elmo.

8 QUESTIONS BY MR. RAFFERTY:

9 Q. You see there it says,
10 "Regulatory affairs update, RNA leadership
11 team, Nate Hartle, senior director,
12 regulatory affairs."

13 Do you see that?

14 A. Yes.

15 Q. November 20, 2015.

16 You see that?

17 A. I do.

18 Q. Okay. Do you recall giving
19 this presentation?

20 A. I'm going to scan through it
21 real quick just so I can refresh --

22 Q. Well, let me -- and feel free
23 to, but I'm just going to -- I'm going to
24 start with the second page, so...

25 A. I -- I believe it was a

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1 conference call, maybe. I don't remember
2 exactly all the details from back then, but
3 this is my work, yeah.

4 Q. It doesn't matter. This is
5 your work.

6. A. Yeah.

7 Q. That's all I wanted to get.

[illegible]